

Benjamin H. Zieman, Esq. (082712013)

ANDERSON & SHAH LLC

457 Haddonfield Road, Suite 120

Cherry Hill, New Jersey 08002

856-393-2371 (p); 856-528-1700 (f)

bzieman@andersonshahlaw.com

*Attorney for Defendants Atlantic City Board of Education, former Superintendent Paul A. Spaventa, and current Superintendent Barry Caldwell*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

JANE DOE, on behalf of JOHN DOE,  
her minor child,

Plaintiffs,

v.

MARTY SMALL, SR., et al.,

Defendants.

Hon. Joseph H. Rodriguez, U.S.D.J.

Hon. Sharon A. King, U.S.M.J.

Docket No. 1:21-cv-11189-JHR-SAK

**APPLICATION FOR A CLERK'S  
EXTENSION OF TIME TO  
ANSWER OR MOVE TO DISMISS  
PURSUANT TO L. CIV. R. 6.1(b)**

Application is hereby made for a Clerk's Order extending the time within which Defendants Atlantic City Board of Education, Paul A. Spaventa, and Barry Caldwell may answer or move to dismiss the amended complaint, and it is represented that:

1. No previous extension has been obtained with respect to filing an answer or moving to dismiss the amended complaint.
2. On July 8, 2021, Defendants filed a motion to dismiss the original complaint. *See* Dkt. No. 24.

3. On August 16, 2021, Plaintiff filed and served Defendants with an amended complaint, thereby mooting Defendants' motion to dismiss. *See* Dkt. No. 32.

4. Under Fed. R. Civ. P. 15(a)(3), Defendants have fourteen (14) days, *i.e.*, until August 30, 2021, to answer or move to dismiss the amended complaint.

5. Pursuant to L. Civ. R. 6.1(b), Defendants request that the time to answer or move to dismiss the amended complaint be extended by fourteen (14) days, *i.e.*, until September 13, 2021.

ANDERSON & SHAH LLC

Dated: August 18, 2021

By: s/ Benjamin H. Zieman  
Benjamin H. Zieman, Esq.

The above application is ORDERED GRANTED and the time within which Defendants shall answer or move to dismiss the amended complaint is hereby extended to September 13, 2021.

WILLIAM T. WALSH, CLERK

By: \_\_\_\_\_  
Deputy Clerk